

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CITY OF PHILADELPHIA, MAYOR AND
CITY COUNCIL OF BALTIMORE, QUINN
EMANUEL URQUHART & SULLIVAN,
LLP, WOLLMUTH MAHER & DEUTSCH
LLP,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION,
BANK OF AMERICA, N.A., BANC OF
AMERICA SECURITIES LLC, MERRILL
LYNCH, PIERCE, FENNER & SMITH
INCORPORATED, BARCLAYS BANK
PLC, BARCLAYS CAPITAL INC.,
CITIGROUP, INC., CITIBANK N.A.,
CITIGROUP GLOBAL MARKETS INC.,
CITIGROUP GLOBAL MARKETS
LIMITED, GOLDMAN SACHS & CO. LLC,
JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK, N.A., J.P. MORGAN
SECURITIES LLC, MORGAN STANLEY,
MORGAN STANLEY SMITH BARNEY
LLC, MORGAN STANLEY & CO. LLC,
MORGAN STANLEY CAPITAL GROUP
INC., THE ROYAL BANK OF CANADA,
RBC CAPITAL MARKETS LLC, WELLS
FARGO & CO., WELLS FARGO BANK,
N.A., WACHOVIA BANK, N.A., WELLS
FARGO FUNDS MANAGEMENT, LLC,
WELLS FARGO SECURITIES LLC,

Defendants.

Misc. Action No.: _____

Underlying Litigation:
19-CV 1608 (JMF) United States District
Court for the Southern District of New York

**MOTION TO TRANSFER, OR, IN THE ALTERNATIVE, MODIFY
DEFENDANTS' SUBPOENA TO EDELWEISS FUND, LLC**

Plaintiffs The City of Philadelphia and the Mayor and City Council of Baltimore, and non-parties Quinn Emanuel Urquhart & Sullivan, LLP and Wollmuth Maher & Deutsch LLP respectfully move to (1) transfer this proceeding to the Southern District of New York, the issuing court where the underlying action is pending; or, in the alternative, (2) quash the portion of the subpoenas served by the above-captioned Defendants on Edelweiss Fund, LLC that expressly seek privileged communications and protected work product. This Motion is based on Rules 26 and 45 of the Federal Rules of Civil Procedure, the facts, arguments, and law set forth in the accompanying Memorandum of Law and supporting declarations, and any arguments of counsel.

Dated: February 1, 2022

PRICKETT, JONES & ELLIOTT, P.A.

By: /s/ J. Clayton Athey
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Attorneys for Movants